

Q2-3

This document is an abbreviation of the AZO pigment PPE assessment.  
The PPE assessment is a 110 page document covering many more  
tasks than required to respond to the EPA Question 3, 10/15/2003 letter

## **CERTIFICATION OF HAZARD ASSESSMENT FOR AZO PIGMENTS PLANT PPE RECOMENDATIONS**

### **Assessments Included Under This Cover:**

- General Plant PPE
- Batchmaker PPE
- Operator PPE
- Maintenance PPE
- QC Lab PPE

Clariant has assessed it's Azo Pigments department regarding the need for PPE. From 12/10/98 through 6/12/99 Paul Dickinson, the department ESHA Engineer evaluated the hazards present or likely to be present which necessitate the use of PPE. He has recently surveyed areas, jobs, tasks, etc. in Azo, and at other times surveyed each of the areas, jobs, and tasks etc. found in the building. Where we believe PPE is necessary, we have selected the relevant products to afford the proper level and type of protection. We have communicated, verbally and in writing, the selection decisions to each affected employee, and the assessment found under this cover are accessible to all Azo employees via the Azo Touch Screen system. We will continually reassess hazards (and the need for PPE) by identifying and evaluating new equipment and processes, reviewing accident records, and reevaluating the suitability of previously selected PPE.

Last Update - 7/19/02

**Paul  
Dickinson**

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**REDACTED SECTION**

**TSCA  
CONFIDENTIAL  
BUSINESS  
INFORMATION**

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# **REDACTED SECTION**

**TSCA  
CONFIDENTIAL  
BUSINESS  
INFORMATION**

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## **RTK Training and Process Overview Session for** **Addenda for Red 144 and Red 214**

### **RTK Section:**

**I. Polychlorinated Bi Phenyls** Common names PCB, Polychlorinated di-phenyl and trade named various Arochlors. Currently most found in Red 144 and Red 214 are in the tetrachloro family of PCB meaning that they have 4 chlorine atoms attached to each molecule of PCB.

**Appearance and Odor:** Pure material is a solid or a liquid at room temperature. The expected boiling point of pure material is in the range of 300-400 Celcius (570-750 F). No specific odor has been reported for pure material. Concentration is so low in product and intermediates that it does not appreciably change the nature, color or odor of these. It has been found up to 2000 PPM (0.2%) in some of our dried product.

**Effects of Overexposure:** **Inhalation:** Extremely low volatility, inhalation unlikely except as a mist or on powder or other carrier.

**Short Term Exposure:** See effect of specific component exposed to.

**Long Term Exposure:** See effect of specific component exposed to.

#### **Skin Contact:**

**Short Term Exposure:** See effect of specific component exposed to.

**Long Term Exposure:** See effect of specific component exposed to.

#### **Eye Contact**

**Short Term Exposure:** See effect of specific component exposed to.

**Long Term Exposure:** See effect of specific component exposed to.

#### **Ingestion**

**Short Term Exposure:** See effect of specific component exposed to.

**Long Term Exposure:** See effect of specific component exposed to.

**Primary Routes of Exposure:** Inhalation ingestion.

**General Effects of Exposure:** Most common health effect of people exposed to large amounts of PCBs are skin conditions such as acne and rashes. Studies in exposed workers have shown changes in blood and urine that may indicate liver damage. Animals that ate large quantities had mild liver damage and some died. Animals that ate smaller amounts of PCBs in food over several weeks or months developed various kinds of health effects, including anemia, acne-like skin conditions; and liver, stomach, and thyroid gland injuries. Other effect of PCBs in animals include changes in immune system, behavioral alterations and impaired reproduction.

PCBs are not known to cause birth defects. However, PCBs are known to travel to breast milk and children may be exposed by that route.

The EPA and International Agency for Research on Cancer (IARC) have determined that PCBs are probably carcinogenic to humans. Most likely cancers to be caused by PCBs are liver and biliary.

**Normal Exposure:** PCBs have been in the environment for quite a while. Due to this the EPA has set limits on "acceptable" exposure. For example, the limit on drinking water is 0.5 microgram/liter. The FDA has set limits on various food groups which vary from 0.2 – 3 parts of PCBs per million parts (0.2-3 PPM) of food. Many states have established fish and wildlife consumption advisories for PCBs.

Agency for Toxic Substances and Disease Registry (ASTR) has set Minimal Risk Levels (MRL) guidelines for PCBs at which no appreciable risk of adverse noncancerous health risks. The levels for PCB is 0.03 mg/kg/day for up to a year and 0.02 mg/kg/day for exposures of a year or longer. For example, for a 80 kg (176 lb) person these would correlate to 2.4 mg/day up to a year or 1.6 mg/day for exposures a year or longer.

**NFPA Rating/PPE:** See component mixed with  
Personal Protection = Standard PPE as per batch sheets. Wash any pigment off skin.

### **Emergency and First Aid Procedures:**

- 1. Inhalation -** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)
- 2. Eye Contact -** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)
- 3. Skin Contact -** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)
- 4. Ingestion -** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)
- 5. Fire Fighting-** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)
- 6. Spill or leak procedures-** See Emergency and First Aid Procedures for specific component (such as Thionyl chloride, orthodichlorobenzene, presscake, etc.)

Q3-1

Dick Fischer

05/24/1999 09:35 AM

To: David Brunetti/CLARIANT@CLARIANT  
cc: Richard Castenson/CLARIANT@CLARIANT  
Subject: dcb on dazn's

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Forwarded by Dick Fischer/CLARIANT on 05/24/99 09:26 AM

Marlene Capraro  
05/24/99 09:26 AM

To: Dick Fischer/CLARIANT@CLARIANT  
cc:  
Subject: dcb on dazn's



Dazndcb1.rtf Dazndcb2.rtf

open icons to view reports  
marlene

**SAMPLE TEST RESULTS**

PRODUCT: DAZN  
PRODUCT CODE: 911205  
Lot #: WO 2003  
REF.#: 10840

Date Completed: 5/20/1999

Test / Analysis	Results	Analyst Initial
GC FOR PCB'S prepped by mc = 0.4220g test for tetra & tri chloro pcb	nd < 1 ppm	SM

Quality Control / Analytical  
Dept.  
May 24, 1999

**SAMPLE TEST RESULTS**

PRODUCT: DAZN  
PRODUCT CODE: 911205  
Lot #: 1698-128-2  
REF.#: 10841

Date Completed: 5/20/1999

Test / Analysis	Results	Analyst Initial
GC FOR PCB'S prepped by mc = 0.4155g test for tetra and trichloro pcb	nd < 1 ppm	SM

Quality Control / Analytical  
Dept.  
May 24, 1999

Q3-2

Dick Fischer 11/07/2000 01:12 PM

To: Richard Castenson/CLARIANT@CLARIANT, David Brunetti/CLARIANT@CLARIANT, Ralph  
Svenningsen/CLARIANT@CLARIANT

cc:  
Subject: PCB results

Rich,

**Tetrachlorobiphenyl/Trichlorobiphenyl results**

Charlotte

Utah

Comments

REDACTED RESULTS OF UNRELATED TESTING

Nov. Red BN D. Brunetti	1726-85	11.58/1.16	1.8/ND
Nov. Red BN Pilot Plant	1726-154	1.49/<0.2	6.5/ND
DAZN Methacrylamide	1724-106-1	7.32/0.29	8.3/ND
DAZN	1724-106-2	8.87/0.40	6.8/ND

Not bad agreement. Data Chem has a 3 page report which I shall bring to you.

Dick

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DAZN monitoring results

#	Sample	Source	Date Sample sent to lab	Results PPM
DAZN	DAZN USEA000669	Azo	8/22/2003	4.5
DAZN	DAZN USEA000672	Azo	9/10/2003	4.1
DAZN	DAZN USEA000674	Azo	8/22/2003	4.3
DAZN	DAZN USEA000675	Azo	8/22/2003	2.6
DAZN	DAZN 6303251	Azo	11/20/2000	5.1
DAZN	DAZN 6303252	Azo	11/20/2000	7.9
DAZN	DAZN 6303253	Azo	11/20/2000	5.4
DAZN	DAZN 6303254	Azo	11/20/2000	5.3
DAZN	DAZN 6303255	Azo	11/20/2000	4.8
DAZN	DAZN 6303256	Azo	11/20/2000	4.9
DAZN	DAZN 6303257	Azo	11/20/2000	2.5
DAZN	DAZN 6312852	Azo	3/2/2001	8.6
DAZN	DAZN 6312854	Azo	3/2/2001	8.4
DAZN	DAZN 6312855	Azo	3/2/2001	6.1
DAZN	DAZN 6312858	Azo	3/2/2001	7.9
DAZN	DAZN 6312862	Azo	3/16/2001	5.6
DAZN	DAZN 6312865	Azo	3/16/2001	2.2
DAZN	DAZN 6312867	Azo	3/16/2001	14.8
DAZN	DAZN 6312869	Azo	3/16/2001	6.6
DAZN	DAZN 6312874	Azo	3/16/2001	3.2

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### Samples of Red 144/214 sent for analysis

#	Sample	Source	Date Sent	Date Received	Results PPM
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#### Original samples sent as part of QA Audit

3B	Red 3B USEA000164	Blend: tested in Charlotte	6/20/2003	7/8/2003	502
3B	Red 3B USEA000165	Blend: tested in Charlotte	6/20/2003	7/8/2003	427
3B	Red 3B USEA000166	Blend: tested in Charlotte	6/20/2003	7/8/2003	386
BNP	Red BNP US63268101	Blend: tested in Charlotte	6/20/2003	7/8/2003	76
BNP	Red BNP US63268102	Blend: tested in Charlotte	6/20/2003	7/8/2003	116
BNP	Red BNP US63268103	Blend: tested in Charlotte	6/20/2003	7/8/2003	108
BNP	Red BNP US63268104	Blend: tested in Charlotte	6/20/2003	7/8/2003	203

#### Confirmation of original QA Audit results

3B	Red 3B USEA000165	Blend: tested in Germany	7/15/2003	9/9/2003	600
BNP	Red BNP 63385705	Blend: tested in Germany	7/15/2003	9/9/2003	660

#### Results from post discovery investigation

3B	Red 3B USEA000302	Blend: tested in Charlotte	9/12/2003	9/14/2003	814
3B	Red 3B USEA000303	Blend: tested in Charlotte	9/12/2003	9/14/2003	843
BNP	Red BNP 63385701	Blend: tested in Charlotte	9/12/2003	9/14/2003	557
BNP	Red BNP 63385702	Blend: tested in Charlotte	9/12/2003	9/14/2003	389
BNP	Red BNP 63385703	Blend: tested in Charlotte	9/12/2003	9/14/2003	700
BNP	Red BNP 63385704	Blend: tested in Charlotte	9/12/2003	9/14/2003	596
BNP	Red BNP 63385706	Blend: tested in Charlotte	9/12/2003	9/14/2003	666
BNP	Red BNP MXSC313501	Blend: tested in Charlotte	9/12/2003	9/14/2003	455
BNP	Red BNP MXSC313502	Blend: tested in Charlotte	9/12/2003	9/14/2003	415
BNP	Red BNP US6319101	Blend: tested in Charlotte	9/15/2003	9/17/2003	19
BNP	Red BNP US6319102	Blend: tested in Charlotte	9/15/2003	9/17/2003	34

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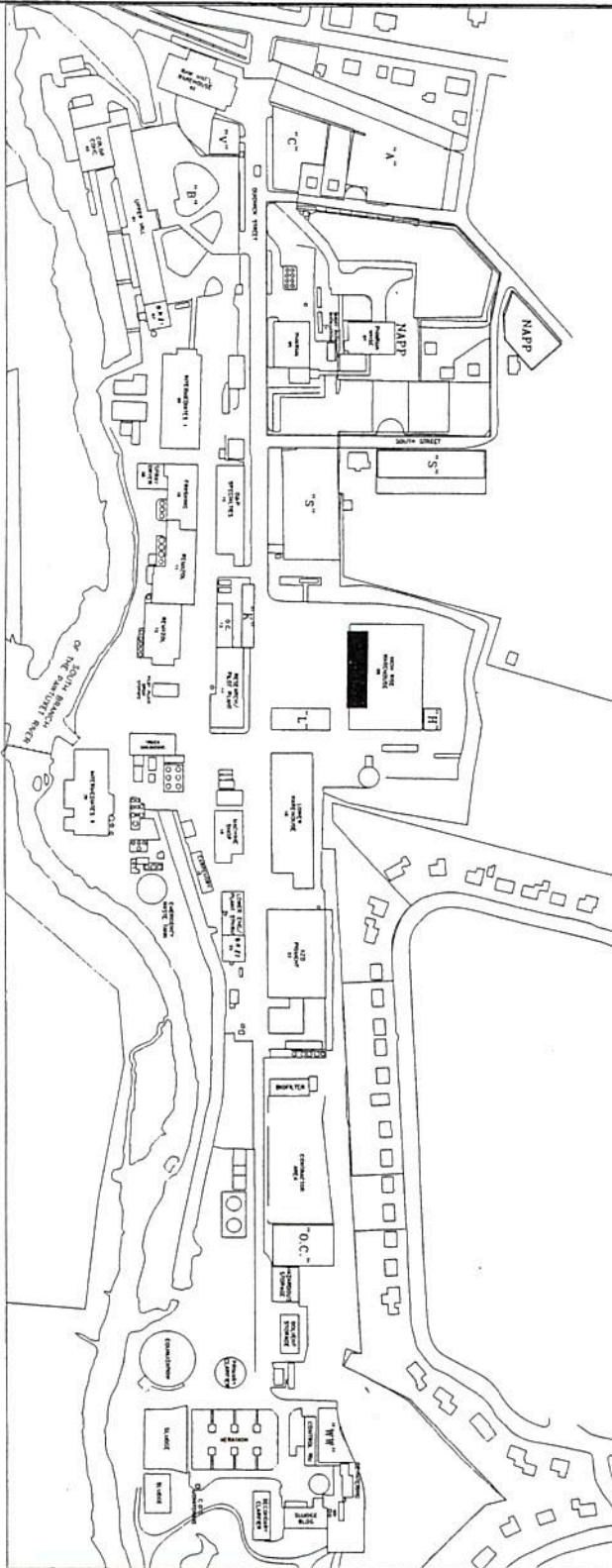
Pigment 144/214 Analysis

Samples sent for analysis					
		Production		Date sent	Results
#	Sample	in SAP	source	to Lab	PPM
1	Red BNP 6213701	08/15/01	Batch	9/24/2003	20
2	Red BNP 6213702 (9-2001)	09/19/01	Batch	9/12/2003	22
3	Red BNP 6213703	10/02/01	Batch	9/24/2003	43
4	Red BNP 6213704	10/05/01	Batch	9/24/2003	32
5	Red BNP 6213706	02/14/02	Batch	9/23/2003	107
6	Red BNP 62253701	04/15/02	Batch	9/23/2003	47
7	Red BNP 62253702	04/29/02	Batch	9/18/2003	113
8	Red BNP 62253703	04/30/02	Batch	9/23/2003	52
9	Red BNP 62253705	06/25/02	Batch	9/23/2003	108
10	Red BNP 62253707	06/28/02	Batch	9/23/2003	119
11	Red BNP 62253708	07/19/02	Batch	9/23/2003	102
12	Red BNP 62253709	07/19/02	Batch	9/23/2003	280
13	Red BNP 62253710	08/05/02	Batch	9/23/2003	104
14	Red BNP 62253711	08/12/02	Batch	9/18/2003	82
15	Red BNP 62253712	08/16/02	Batch	9/12/2003	255
16	Red BNP 62253713	08/21/02	Batch	9/23/2003	85
17	Red BNP 62253714	08/27/02	Batch	9/23/2003	87
18	Red BNP 62253715	08/30/02	Batch	9/23/2003	112
19	Red BNP 62253716	09/10/02	Batch	9/24/2003	146
20	Red BNP 62253717	09/16/02	Batch	9/23/2003	180
21	Red BNP 62253718	09/19/02	Batch	9/23/2003	424
22	Red BNP 62253719	09/24/02	Batch	9/18/2003	528
23	Red BNP 62253720	09/27/02	Batch	9/23/2003	237
24	Red BNP 62253721	09/30/02	Batch	9/18/2003	248
25	Red BNP 62253722	10/08/02	Batch	9/23/2003	323
26	Red BNP 62253723	10/11/02	Batch	9/23/2003	335
27	Red 3B 62254101	11/5/2002	Batch	9/23/2003	2034
28	Red 3B 62254102	11/19/2002	Batch	9/23/2003	858
29	Red 3B 62254103	11/19/2002	Batch	9/23/2003	606
30	Red 3B 62254103	11/19/2002	Batch	9/18/2003	470
31	Red 3B 62254104	12/3/2002	Batch	9/23/2003	277
32	Red 3B 62254105	12/13/2002	Batch	9/23/2003	256
33	Red 3B 62254106	12/18/2002	Batch	9/23/2003	476
34	Red BNP 62313801	01/20/03	Batch	9/23/2003	555
35	Red BNP 62313802	02/03/03	Batch	9/18/2003	619
36	Red BNP 6R313803-EC	02/24/03	Batch	9/10/2003	273
37	Red BNP 6R313804-EC	02/27/03	Batch	9/10/2003	213
38	Red BNP 6R313805-C	02/28/03	Batch	9/10/2003	182
39	Red BNP 6R313805-EC	02/28/03	Batch	9/10/2003	203
40	Red BNP 6R313806-C	03/11/03	Batch	9/10/2003	532
41	Red BNP 6R313807-EC	03/11/03	Batch	9/10/2003	239
42	Red BNP 6R313808-EC	03/17/03	Batch	9/10/2003	359
43	Red BNP 6R313809-C	03/18/03	Batch	9/10/2003	1061
44	Red BNP 6R313810-C	03/20/03	Batch	9/10/2003	421
45	Red BNP 62313811	03/25/03	Batch	9/29/2003	493
46	Red BNP 62313812	04/09/03	Batch	9/23/2003	115
47	Red BNP 62313813	04/09/03	Batch	9/29/2003	296
48	Red BNP 62313814	04/09/03	Batch	9/29/2003	532

Pigment 144/214 Analysis

		Production		Date sent	Results
#	Sample	in SAP	source	to Lab	PPM
49	Red 3B 6R313701-EC	4/28/2003	Batch	9/10/2003	824
50	Red 3B 6R313702-EC	5/2/2003	Batch	9/10/2003	130
51	Red 3B 62313703	5/5/2003	Batch	9/23/2003	498
52	Red 3B 6R313704-EC	5/5/2003	Batch	9/10/2003	758
53	Red 3B 6R313705-EC	5/6/2003	Batch	9/10/2003	528
54	Red 3B 6R313706-EC	5/12/2003	Batch	9/10/2003	574
55	Red 3B 6R313707-EC	5/14/2003	Batch	9/10/2003	590
56	Red BNP 62313816	05/19/03	Batch	9/12/2003	694
57	Red BNP 62313817	05/28/03	Batch	9/12/2003	249
58	Red BNP USEA000221	06/01/03	Batch	9/12/2003	171
59	Red BNP USEA000222	06/07/03	Batch	9/12/2003	382
60	Red BNP USEA000223	06/13/03	Batch	9/12/2003	183
61	Red BNP USEA000232	06/21/03	Batch	9/29/2003	240
62	Red BNP USEA000233	06/27/03	Batch	9/29/2003	501
63	Red BNP USEA000234	07/03/03	Batch	9/29/2003	475
64	Red BNP USEA000372	07/09/03	Batch	9/12/2003	180
65	Red BNP USEA000373	07/15/03	Batch	9/12/2003	246
66	Red BNP USEA000374	07/21/03	Batch	9/12/2003	304
67	Red BNP USEA000375	07/27/03	Batch	9/12/2003	229
68	Red 3B USEA000235	08/02/03	Batch	9/15/2003	101
69	Red 3B USEA000238	08/08/03	Batch	9/15/2003	100
70	Red 3B USEA000239	08/14/03	Batch	9/15/2003	35
71	Red 3B USEA000240	08/20/03	Batch	9/15/2003	99
72	Red 3B USEA000241	08/26/03	Batch	9/18/2003	116
73	Red 3B USEA001421	09/01/03	Batch	9/18/2003	53
74	Red 3B USEA001414	09/03/03	Batch	9/18/2003	39
75	Red 3B USEA001416	09/06/03	USEA0001416 lab filtered/dried from K2204 (1734-235-9)	9/25/2003	37
76	Red 3B USEA001415	09/08/03	sample from press, lab dried	9/25/2003	40

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### PCB Storage Area

DWG FILE NAME C00050GA									
REV	DATE	BY	DATE	Clarrion Corporation 3500 Highway 100 Conway, AR 72034					
B	5/10	FJM	BM	ADDED A MAPS PARKING LOTS					
A	5/7/05	JJM	ST	ADDED MAPS PARKING LOTS					
DESCRIPTION									
PARKING LOT PLAN									
CONCRETE									
PLAN									
DATE									
LAST FOR DATE									
REV	DATE	BY	DATE	CIVIL COMPOSITE PARKING LOT PLAN CONCRETE SITE PLAN					
B	5/10	FJM	BM						
A	5/7/05	JJM	ST						
DESCRIPTION									
PARKING LOT PLAN									
CONCRETE									
PLAN									
DATE									
LAST FOR DATE									

Q5-2

# **CAUTION**

**CONTAINS**

# **PCBs**

(Polychlorinated Biphenyls)

**A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761 — For Disposal Information contact the nearest U.S. EPA Office**

**In case of accident or spill, call toll free the U.S. Coast Guard National Response Center:  
800:424-8802**

**Also Contact**

**Tel. No. \_\_\_\_\_**

**Security  
823-2000**

CARLTON INDU